Message

From: Keller, Lynn [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP

(FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=08038B86D66A47D3AACA8BEE1A63A5A7-LKELLER]

Sent: 12/30/2015 5:44:27 AM

To: Fennessy, Christopher [christopher.fennessy@Rocket.com]

Subject: FW: Aerojet RTCs - Ned Input

Hi, Chris. Ned is fine with Trudy Pulley's SLERA comments—nothing additional.

Thanks and happy new year, Lynn

*Lynn M. Keller, EI, PMP*US EPA Region 9 RPM
75 Hawthorne St, SFD 7-1
San Francisco, CA 94105
415.947.4162

From: Black, Ned

Sent: Tuesday, December 29, 2015 10:39 AM
To: Keller, Lynn < Keller. Lynn@epa.gov>
Subject: RE: Aerojet RTCs - Ned Input

These look great.

ned black, ph.d. us epa r9 regional cercla ecologist 415-972-3055

Please be advised I currently have limited access to email when I am not in the office (e.g., on travel), therefore please be patient with any communication delays.

From: Keller, Lynn

Sent: Friday, December 18, 2015 3:00 PM

To: Black, Ned

Subject: FW: Aerojet RTCs - Ned Input

Hi, Ned! Today I received the Aerojet OU7 RTCs on the eco risk/SLERA from Trudy Pulley (CH2MHill). I wanted to be sure you had the chance to check out Trudy's responses and add any of your own before I forward these to Aerojet for action. Can you please let me know what you think when you get a chance? I realize it's the holidays but I was hoping we could wrap these issues up by 8 Jan if possible.

Happy holidays to you and talk with you soon, Lynn

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From: Tom.Lae@CH2M.com [mailto:Tom.Lae@CH2M.com]

Sent: Friday, December 18, 2015 11:18 AM **To:** Keller, Lynn < Keller, Lynn@epa.gov>

Cc: <u>Trudy.Pulley@CH2M.com</u> Subject: FW: Aerojet RTCs

Lynn-

Below are a couple additional IOU Draft SLERA comments from Trudy as follow-up to our 12/8 technical meeting with Aerojet and the Agencies. As I mentioned earlier today, you may want to circle these thru Ned. Let me or Trudy know if you or Ned have any questions or need further clarification.

Thanks!

Tom Lae, PG

Project Manager/Operations Leader Environment and Nuclear Business Group

CH2MHILL

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Tom Lae

From: Pulley, Trudy/SAC

Sent: Thursday, December 17, 2015 8:00 PM **To:** Lae, Tom/SAC < <u>Tom.Lae@CH2M.com</u>>

Subject: RE: Aerojet RTCs

Tom -

Additional Comments to the RTCs are as follows:

- 1) General Comment 1b/1c Aerojet will prepare an appendix summarizing the methods of selection for alternative BAFs and TRVs. In addition, any alternative values proposed thus far will also be included in a tabular format. This appendix will be subject to agency review prior to inclusion with the OU-7 SLERA and the Ecological White Paper.
- 2) General Comment 2 Aerojet will provide forward risk calculations to support all SLERA Step 3 decisions to exclude chemicals as COPECs for the OU-7 SLERA and all subsequent SLERAs. This includes use of the 95UCL as the EPC, alternative BAFs and/or alternative TRVs. Appendix O to the RTCs includes example forward calculations using original and alternative BAFs to demonstrate contribution of soil intake vs dietary intake for molybdenum and nitrate for the MAs/media highlighted in yellow below. These examples are acceptable for use also as supporting calculations for the alternative BAFs in those MAs/media. However supporting calculations for all other Step 3a refinements (not highlighted) need to be provided (list below is based on Table 6.10-1 of the SLERA):

EPC=95UCL

Hogout - molybdenum (SB), perchlorate (SB)

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Line 01 – lead (SS, SB), cadmium (SB), zinc (SB)
Line 03 – silver (SB), 1,2-dichloroethene (SV)
TTA – zinc (SS)
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Alternate BAF

Area 40 – zinc (SS)

CDA - zinc (SS)

Hogout - Nitrate (SS), molybdenum (SB)

Line 01 – molybdenum (SD, SS, SB), zinc (SS), nitrate (SB)

Line 03 - molybdenum (SS)

Line 04 – molybdenum (SS, SB), perchlorate (SS), zinc (SS)

Line 05 - molybdenum (SS, SB)

TTA - zinc (SS)

Alternate TRV

Area 40 - perchlorate (SB)

Hogout - perchlorate (SB)

Line 03 – perchlorate (SB)

Line 04 - perchlorate (SB)

Thanks!

Trudy